

all [0093] Figures 20A and 20B are an embodiment of a dashboard 320 of the present invention. Dashboard 320, is a scorecard relating to accounts receivable turns and hedged commitments for a Chief Financial Officer (CFO) and includes, but is not limited to triggers 322, action plan information 324, owner/timing information 326 and status information 328.

REMARKS

Submitted herewith is a Request for Approval of Formal Drawings and Drawing Changes. Figures 4, 12, 13, 17, and 20 were expanded into multiple drawing sheets to meet font size requirements. Specifically, originally filed Figure 4 is now illustrated in Figures 4A and 4B; originally filed Figure 12 is now illustrated in Figures 12A and 12B; originally filed Figure 13 is now illustrated in Figures 13A and 13B; originally filed Figure 17 is now illustrated in Figures 17A, 17B, 17C, and 17D; and originally filed Figure 20 is now illustrated in Figures 20A and 20B.

Additionally, Applicants hereby submit a substitute drawing sheet for Figure 1 for examination in the above-referenced application. Specifically, reference label "20" on the "Database" has been replaced with reference label "18." Applicants respectfully requests approval of the indicated drawing changes in accordance with the description at page 17, paragraph 49 of the specification.

In anticipation of the approval of the drawing change, Applicants are submitting substitute drawings incorporating the above-noted change. No new matter has been added.

The specification has been amended in accordance with the expanded figures. Submitted herewith is a Submission of Marked Up Paragraphs.

Express Mail No.: EL 752243347 US

**PATENT
60709-00012**

Favorable action is respectfully solicited. If any fee is due, please charge Deposit
Account No. 01-2384.

Respectfully Submitted,



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Express Mail No.: EL 752243347 US

PATENT
60709-00012

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Barton et al.

Serial No.: 09/848,051

Filed: May 3, 2001

For: METHODS AND SYSTEMS FOR
COMPLIANCE PROGRAM
ASSESSMENT

Art Unit: 2152

Examiner:

RECEIVED
APR 04 2002
Technology Center 2100

SUBMISSION OF MARKED UP PARAGRAPHS

Commissioner for Patents
Washington, D.C. 20231

In accordance with 37 CFR § 1.121(b)(1)(iii) Applicants herewith submit a
Submission Of Marked Up Paragraphs.

IN THE SPECIFICATION

On page 3, delete paragraph [0018] and replace with the following paragraph:

[0018] [Figure 4 is] Figure 4A is a first portion of a diagram listing action items to be taken based on an answer to a question. Figure 4B is a second portion of a diagram listing action items to be taken based on an answer to a question.

On page 4, delete paragraphs [0026]-[0027] and replace with the following paragraphs:

[0026] [Figure 12 is] Figure 12A is first portion of a risk Quality Function Deployment (QFD) matrix. Figure 12B is second portion of a risk Quality Function Deployment (QFD) matrix.

[0027] [Figure 13 is]Figure 13A is first portion of a risk Quality Function Deployment (QFD) matrix including a QFD score. Figure 13B is second portion of a risk Quality Function Deployment (QFD) matrix including a QFD score.

On page 4, delete paragraph [0031] and replace with the following paragraph:

[0031] [Figure 17 is]Figure 17A is first portion of a policy scorecard. Figure 17B is second portion of a policy scorecard. Figure 17C is third portion of a policy scorecard. Figure 17D is fourth portion of a policy scorecard.

On page 4, delete paragraph [0034] and replace with the following paragraph:

[0034] [Figure 20 is]Figure 20A is first portion of an embodiment of a risk dashboard. Figure 20B is second portion of an embodiment of a risk dashboard.

On page 10, delete paragraph [0062] and replace with the following paragraph:

[0062] In one embodiment, interviews 78 (shown in Figure 3) are conducted in accordance with a question owner's matrix. More specifically, [Figure 4 shows]Figures 4A and 4B show one embodiment of a question owner's matrix 100. A question owner's matrix 100 is used as a guideline for identifying an interviewee for each sub-group of questions. The question owner's matrix 100 is constructed using the knowledge base within server 12. The knowledge base may include any information relevant to conducting an interview relating to compliance. The knowledge base may include, for example, information associating a group of questions with relevant functional knowledge, a summary of the details of program current status, improvement opportunities, identification of action item owners and a list of potential best practices. The question owner's matrix 100 lists compliance assessment areas 102. Compliance assessment areas 102 are any areas of a business that are being reviewed for compliance. Examples of compliance assessment areas 102 include, but are not limited to infrastructure, equal employment opportunity, antitrust, trade controls, ethical business practices and supplier relationships. The question owner's matrix 100 may also identify potential interviewees 104 by function for each area assessment using the

knowledge base. Examples of interviewees 104 include, but are not limited to engineering, marketing, manufacturing, legal, purchasing, finance, and human resources.

On page 13, delete paragraph [0071] and replace with the following paragraph:

[0071] In Figure 10, next to compliance risks 166, the specific policy numbers are identified. These policy numbers are also cross-referenced appropriately in [Figure 9, 11, 12, and 13]Figures 9, 11, 12A, 12B, 13A and 13B. For example, Policy Number 20.4 refers to "Ethical Business Practices", Policy Number 20.5 refers to "Complying with the Antitrust Laws", Policy Number 30.5 refers to "Avoiding Conflicts of Interest", Policy Number 30.7 refers to "Financial Controls & Records" and Policy Number 30.13 refers to "Supplier Relationships". Other policies that are referenced are, Policy Numbers - 20.2 Equal Employment Opportunity, 20.3 Health, Safety & Environmental Protection, 20.9 Following International Trade Controls, 20.10 Working with Government Agencies, 20.12 Prohibition on Business with South Africa, 20.13 Insider Trading & Stock Tipping, and 30.9 Participation in Hazardous Business. Each of these policies are described in detail in internal business documents and also summarized in "the Spirit & the Letter of Our Commitment" (incorporated by reference).

On page 15, delete paragraph [0074] and replace with the following paragraph:

[0074] Further, a risk QFD matrix is constructed. [Figure 12 illustrates]Figures 12A and 12B illustrate a risk QFD matrix 180. Risk QFD matrix 180 is constructed using information gathered in creating business risk model 160 (shown in Figure 10) and compliance risk requirements list developed in creating severity matrix 170 (shown in Figure 11). Risk QFD matrix 180 includes, for example, the business products, processes and environment and is stored within server 12.

On page 16, delete paragraph [0077] and replace with the following paragraph:

[0077] The score is then entered into risk QFD matrix 180. [Figure 13 illustrates]Figures 13A and 13B illustrate one embodiment of a completed risk QFD matrix

190 including a QFD score 192. The QFD score 192 may be calculated by any known method. In one specific embodiment, server 12 is configured to calculate the QFD score as:

On page 16, delete paragraph [0080] and replace with the following paragraph:

[0080] Once the immediate risks have been identified, the findings are summarized from risk QFD matrix 180 (shown in [Figure 12]Figures 12A and 12B) in accordance with a risk prioritization matrix. The findings are summarized based on risk criteria and process strength controls. First, the findings are summarized in the risk prioritization matrix (RPM) using the standard template. Next, the risk QFD score 192 guides the placement of the risks into the RPM. In one specific embodiment, qualitative input from counsel is included to translate those results that are not as clear cut as numbers from the risk QFD score 192. These findings are then listed in the available space on the RPM. Once the RPM is completed, it is reviewed with compliance and functional leaders. The top three to five compliance requirements having the highest risks in the RPM are, for example, automatically identified to drive corrective actions.

On page 18, delete paragraph [0090] and replace with the following paragraph:

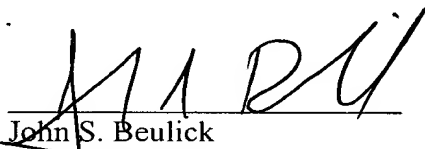
[0090] The process in reducing an RPN is monitored. In a specific embodiment, monitoring is accomplished by using policy scorecards. [Figure 17 is]Figures 17A-17D are an embodiment of a scorecard 270. Scorecards 270 measure capabilities of specific processes. The scorecard formats are stored in server 12 (shown in Figures 1 and 2) and are part database 18. Scorecards 270 are business specific and in the embodiment shown in [Figure 17 includes]Figures 17A-17D include information on process risk assessment 272, inherent risk assessment 274, import infrastructure vitality 276 and import CTQs 278. In alternative embodiments, the knowledge base, and thus scorecard 270 may include information relating to specific business guidelines defined by each business. The knowledge base also includes, but is not limited to information received from functional leaders, quality leaders and policy owners. In yet another exemplary embodiment, Inherent Risks are tabulated against Process Risks for organizing and categorizing various risk categories. The objective in tabulating Inherent Risks versus Process Risks is to strategize set of risks in yet

another way for better management. Control limits may be set for each business risk based on the type of the risk and the tolerance level that the business can accept.

On page 19, delete paragraph [0093] and replace with the following paragraph:

[0093] [Figure 20 is] Figures 20A and 20B are an embodiment of a dashboard 320 of the present invention. Dashboard 320, is a scorecard relating to accounts receivable turns and hedged commitments for a Chief Financial Officer (CFO) and includes, but is not limited to triggers 322, action plan information 324, owner/timing information 326 and status information 328.

Respectfully Submitted,



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